



LAW OFFICES OF  
CORY H. MORRIS  
ATTORNEY &  
COUNSELOR AT LAW

## *Via Electronic Case Filing Only*

January 17, 2020

Hon. Sandra J. Feuerstein, U.S.D.J.  
Eastern District New York, Courtroom 1010  
100 Federal Plaza  
Central Islip, NY 11722

*re* **Plaintiff's Application for Reasonable Attorney's Fees under USERRA**  
***Warren v. Castella Imports et al.* Docket No.: 2:18-cv-04740 (SJF-ARL)**

Dear Judge Feuerstein:

This action was settled before Your Honor except for the amount of Attorneys' fees for the successful Plaintiff's attorneys.

Defendants have not made a good faith offer to settle the matter of Plaintiff's attorneys fees making application to this Honorable Court necessary.

In accordance with Your Honor's Individual Practice and Rules and Court Order, Counsel for Plaintiff have filed the following documents as a "bundle."

In the interests of judicial economy, Counsel for Plaintiff respectfully request Your Honor to schedule this matter for a conference and/or argument.

11/26/2019	Application for Attorneys' fees by Plaintiff's Attorneys
12/12/2019	Declaration of Victor John Yannacone, jr. in support of Plaintiff's application for Attorneys' fees and Exhibit
12/13/2019	Declaration of Cory H. Morris in support of Plaintiff's application for Attorneys' fees and Exhibits
12/12/2019	Plaintiff's Brief supporting motion for award of attorneys' fees
01/13/2020	Defs. Memorandum of Law in opposition to Plaintiff's application for attorneys' fees and costs

135 Pinelawn Road, Suite 250s Melville NY 11747

Please send all mail to:

TEL: 631.450.2515 | FAX: 631.223.7377 | WEB: [coryhморris.com](http://coryhморris.com) | EMAIL: [info@coryhморris.com](mailto:info@coryhморris.com)

515 East Las Olas Boulevard, Suite 120 • Fort Lauderdale, FL 33301 \*By appointment only\*

10/23/2018 Defs. Exhibit A; Waiver of Service of Summons

10/25/2018 Defs. Exhibit B; e-mails from Dentons; waiver of service

12/21/2018 Defs. Exhibit C; Affidavit of service upon Clara Cortes, D.E. 13; Nicole Morello, D.E. 14; Robert Roberts, D.E. 15

05/07/2019 Defs. Exhibit D; letter from Del Bove to Morris re Waiver of Service

01/11/2019 Defs. Exhibit E; Plaintiff's Requests for Admission

Defs. Exhibit F; portion of Docket; D.E. 33 Demand for Jury trial by Defendants; Order of USMJ Lindsay; and D.E. 34 letter motion for production of defendants for depositions;

Defs. Exhibit G; portion of Docket; D.E. 52 Morris letter on John Roumbos; Order of USMJ Lindsay; and D.E. 53 Defs. Letter requesting adjournment

01/17/2020 Plaintiff's Reply Memorandum of Law supporting motion for award of attorneys' fees

We thank the Court for its kind consideration.

Respectfully submitted,

CORY H. MORRIS  
*Attorney for the Plaintiff*

Encl: